

March 2, 2017  
1228 Ponderosa Drive  
Moscow, Idaho 83843

U.S. Forest Service  
IPNF-SO  
Attn: B. Craig Phillips  
3815 Schreiber Way  
Coeur d'Alene, Idaho 83815

Subject: Windy-Shingle Project

Dear Mr. Phillips:

Here are my comments on the proposed Windy-Shingle Project being conducted on the Salmon Ranger District of the Nez Perce/Clearwater National Forest. I am concerned that the US Forest Service intends to pursue this project under the authority of the 2014 Farm Bill and categorically exclude the project from analysis in an environmental assessment or an environmental impact statement.

The project clearly includes potential impacts to endangered species habitat and an existing roadless area, but despite these concerns the agency has elected to move forward under the categorical exclusion policy. The agency appears to have concluded that the impacts to endangered species habitat and roadless character will not be significant and that there are no extraordinary circumstances.

I disagree with this conclusion and would suggest there is significant uncertainty regarding the impacts of the proposal on both of these resources. There are also numerous other issues such as old growth, water quality and impacts to sensitive and management indicator species that are not being adequately addressed with the proposed categorical exclusion.

It is admitted in the Proposed Action that two project area streams (Squaw and Shingle Creeks) are not meeting Forest Plan standards for fisheries and watershed objectives, and that a positive upward trend must be established and supported before additional timber harvest can be pursued in these drainages. Both Squaw and Shingle Creeks are known to support listed Chinook salmon and steelhead. Shingle Creek is a tributary of Rapid River which is also known to support bull trout.

There is no evidence offered in the Proposed Action that an upward trend has been established and supported for the two streams in question. There is also no discussion regarding the impact to listed fish species other than to suggest that impacts will be "unmeasurable compared to

background levels” and that the Idaho Department of Environmental Quality has said that the two streams in question “are fully supporting their beneficial uses”.

The Forest Service offers no evidence or data to support their claims of an upward trend and that over 2800 acres of proposed activity will not cause any additional harm to a listed species. Statements from the Idaho Department of Environmental Quality only suggest that a fishery still exists within the streams in question. The analysis by the State does not evaluate the current trend of the existing fishery and current habitat standards as outlined in the Nez Perce Forest Plan.

Claims that no measurable sediment will be produced from over 2,800 acres of harvest and 2.6 miles of road construction are pure conjecture and not supported by any data. Sediment production has not been scientifically modeled nor have any data been presented that the types of activities proposed here will not produce sediment impacts to listed fish species. Similar arguments have been made on other past projects where the Forest Service could not sustain legal challenges to their upward trend and sediment production analysis (Johnson Bar, Whiskey South, etc.). As been done on several past projects, the sediment analysis assumes a “best case” situation where sediment production is either discounted or ignored.

Risk of creating a new landslide during temporary road construction and timber harvest on steep slopes does not appear to have been adequately considered. The Forest Service claims they can avoid landslide risk by road location and unit placement, but at the same time they were willing to add 198 acres of timber harvest (Unit 5) on high risk landtypes back into the project based on statements at the collaborative meeting. The agency will claim that helicopter logging will help mitigate this increased risk and that their unit layout design will avoid landside problems in other areas.

History has not supported their claims on past projects. Landslides were much more common in logged and roaded areas in the last large flood event (1995-1996) on the Nez Perce/ Clearwater National Forest. Unit layout and design features that the Forest Service claims will avoid these problems, have largely been untested since that time due to low snowpack and lack of rain on snow events that usually generate most landslides in Northern Idaho. Even without the kind of flooding seen in 1995-1996, landslides continue to occur almost each and every year on the Forest and their impact needs to be addressed in a scientifically sound analysis that can’t be done in a categorical exclusion. This is especially true in drainages that support listed fish species.

There is also uncertainty on how this project and several others that are being considered under the Farm Bill will affect roadless character across the Forest. In the proposed action it is acknowledged that 93 acres will be harvested, but it is unclear how much temporary road will be constructed and how the overall roadless character of the Salmon Face Roadless area will be impacted. Irretrievable decisions regarding non-replaceable roadless areas should not be made with a categorical exclusion.

For example, on a recent project (Johnson Bar) the Forest Service claimed that a 10,000+ acre roadless area (Middle Face) was no longer suitable for roadless consideration because there were a few small older helicopter units (smaller in size than what is proposed here) within the roadless

area. The Forest Service then proposed more harvest inside of the Middle Face Roadless Area and suggested that the area no longer qualified as a roadless area under the Idaho Roadless Rule. Will a similar situation develop in the Salmon Face Roadless Area a few years down the road once the initial entry has been successfully implemented with the lack of environmental oversight and public involvement that is permitted under the Farm Bill?

It is also suggested that timber harvest is needed because the area is in the Idaho County Wildland Urban Interface. Interestingly there are no homes nearby to the proposed roadless harvest location and the small town of Riggins, Idaho (Population 267) is over 7-8 miles distant. Other than the desire to treat more acreage, there is a very large uncertainty that the proposed timber harvest will actually do any good for the small town of Riggins which is already separated from the project area by a large expanse of non-forested habitat on the Salmon River breaks.

It appears that the Wildland Urban Interface designation has been very liberally applied by Idaho County and other counties on the Nez Perce/National Forest and is merely being used as a rationalization for garnering more federal funding and increasing local timber harvest. Wildland Urban Interface designations like we see on the Windy-Shingle timber sale often extend for miles from small communities like Riggins and the presence of a few summer homes or backcountry ranches can extend the boundaries even larger distances and into nearby roadless areas.

Projects like Windy-Shingle are rationalized because they are “within the wildland urban interface” and when they are conducted with limited public scrutiny with use of the Farm Bill the potential of abuse is high. These practices have national implications since they tend to divert money and resources away from high density population centers in mixed ownership high-risk landscapes where fuel treatments are actually needed.

The fact that the area is a stronghold for the mountain quail has not been given much consideration in the analysis. Considering the rarity of this species in Idaho and on the Nez Perce/Clearwater National Forest, treatment units should have been designed with the enhancement of habitat conditions for this sensitive species. There is no discussion of past research and how the proposal will directly impact existing habitat. There are only generalized statements that suggest logging will increase the shrub and forb components and that the treatments will be good for the species. However, most of the treatments are aimed at reducing fuel and shrub components. Intermediate and fuel break treatments for example will use thinning and understory fire to reduce shrub and understory components that are likely important for the mountain quail. Regeneration harvest will focus on conifer regeneration at the expense of the shrub component.

Elk habitat effectiveness numbers are not reported in the proposed action, but it is hard to understand how Forest Plan elk habitat effectiveness goals can be maintained given the current open habitat condition of the analysis area and the fact that most of the forested stands within the project area are being targeted for timber harvest. As can be seen in the WindyShingle\_SiteMap\_20170104 the project area includes large expanses of natural grassland and other open areas from past timber harvest. Hiding cover and security appear to be at a premium in a project area that is already heavily roaded. Such conditions suggest that the

existing habitat potential would be quite low according to the Interagency Guidelines for Evaluating and Managing Elk Habitats and Populations in Central Idaho (Servheen 1997). These conditions need to be evaluated in an environmental assessment or environmental impact statement.

There is also no old growth analysis presented in the proposed action and as has been previously stated it is difficult to understand how there can be very much old growth in project area given current conditions. This makes it difficult to evaluate how this project will impact old growth and the species that depend on older forests like the fisher, pileated woodpecker and pine marten.

The proposal also places great risk on a known goshawk nest by limiting habitat protection to a 40 acre buffer around the known nest and former nesting locations. The analysis fails to recognize the importance of the post-fledgling area to this species and the need to leave a relatively intact area around the nest of at least 420 acres (Reynolds et al. 1992). Reynolds suggested that at least 60% of the post-fledgling area be maintained in mature forest, but Moser and Garton (2007) tested this by clearcutting areas around active nests. They demonstrated that goshawks were able to successfully re-nest in the year following clearcutting when 39% of the post-fledgling area was composed of mature forest. This is likely a minimal requirement and higher levels of mature forest will assure greater nesting success.

The post-fledgling area around the existing goshawk nest is already heavily compromised with many large openings and it appears that most of the existing forest within the post-fledgling area would be targeted for harvest. With 160 acres of regeneration harvest, 200 acres of intermediate harvest and 29 acres of fuel break in units two and five, it appears that very little area within the current post-fledgling area would remain untreated. Even with the 40 acre buffer around the existing nest location it is highly unlikely that future nest attempts would be successful.

Finally, I would like to make one additional comment on how this proposal is being presented to the public. I did find that there was a small note in the Lewiston Morning Tribune regarding the collaborative meeting for the proposal, but I have failed to find any legal advertisement to the general public explaining the proposal and asking for scoping comments. If people are not able to attend the collaborative meeting, the only other way to find out about the proposal is by constant review of Forest Service websites. How does the Forest Service expect to get any significant comment from the general public if no real notice is given about the project? Most people do not have the time to drive several hundred miles in the middle of winter to attend a non-descript meeting that may or may not impact areas they are concerned about.

Sincerely,

Harry R. Jageman

## Literature Cited

Moser, B.W., and E.O. Garton. 2009. Short-term effects of timber harvest and weather on Northern Goshawk reproduction in northern Idaho. *J. Raptor Res.* 43, 1–10.

Reynolds, R.T., R.T. Graham, M.H. Reiser, R.L. Bassett, P.L. Kennedy, D.A. Boyce, G. Goodwin, R. Smith, and E.L. Fisher. 1992. Management recommendations for the Northern Goshawk in the southwestern United States. USDA Forest Service General Technical Report RM-217, Fort Collins, CO U.S.A.

Servheen, G., S. Blair, D. Davis, M. Gratson, K. Leidenfrost, B. Stotts, J. White, and J. Bell. 1997. Interagency Guidelines for Evaluating and Managing Elk Habitats and Populations in Central Idaho. Wildlife Bulletin No. 11, Idaho Dept. of Fish and Game. 75p.